

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

LENOX JOHN CURRIE,

Plaintiff,

v.

THE PRUDENTIAL INSURANCE  
COMPANY OF AMERICA,

Defendant.

Case No. 3:19-cv-00517-FDW-DCK

**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR  
DEFENDANT THE PRUDENTIAL INSURANCE COMPANY OF AMERICA  
TO RESPOND TO COMPLAINT**

Defendant, THE PRUDENTIAL INSURANCE COMPANY OF AMERICA (hereinafter “Prudential”), by and through its attorneys, hereby moves for an extension of time of 14 days, until November 22, 2019, to respond to Plaintiff’s Complaint. In support of its Unopposed Motion, Prudential states as follows:

1. Plaintiff filed his Complaint on October 9, 2019.
2. Prudential was served through the North Carolina Department of Insurance with the department receiving the Complaint on October 18, 2019, making Prudential’s Answer to Plaintiff’s Complaint due on November 8, 2019.
3. Prudential began promptly collecting and reviewing the relevant file documents in order to prepare a response to Plaintiff’s Complaint, but requests additional time of 14 days to complete its investigation and prepare its response.

4. On November 6, 2019, Counsel for Prudential conferred with Counsel for Plaintiff regarding the request for an extension of 14 days to respond to Plaintiff's Complaint. Plaintiff's Counsel indicated that Plaintiff does not oppose this request.

5. This motion is filed before the response to the Complaint is due and is sought in good faith and not for the purpose of unwarranted delay.

WHEREFORE, Prudential respectfully requests that the Court issue an order granting it an additional 14 days, until November 22, 2019, to file its response to Plaintiff's Complaint.

Respectfully submitted,

s/ Ethan Goemann

Ethan Goemann

NC Bar No. 50731

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*Counsel for Defendant The Prudential  
Insurance Company of America*

**Date: November 7, 2019**

**CERTIFICATE OF SERVICE**

I hereby certify that on November 7, 2019, I caused a true and correct copy of the foregoing UNOPPOSED MOTION FOR EXTENSION OF TIME to be electronically filed with the Clerk of the Court via the Court's CM/ECF system, which sent notification of such filing to the following counsel of record:

Robert A. Whitlow  
Sellers, Ayers, Dortch & Lyons, P.A.  
301 South McDowell Street, Suite 410  
Charlotte, NC 28204

*s/ Ethan Goemann*  
Ethan Goemann  
Counsel for Defendant